

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TINA LINDQUIST,

Plaintiff,

vs.

HEIM, L.P.,

Defendant.

Civil Action No: 04-249E

**JUDGE SEAN J. MCLAUGHLIN**

PAUL R. ROBINSON, ESQUIRE  
PA I.D. No. 65581  
MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.  
U.S. Steel Tower, Suite 4850  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 261-6600  
Email: [probinson@mdbbe.com](mailto:probinson@mdbbe.com)

**HEIM, L.P.'S PROPOSED JURY VERDICT FORM**

AND NOW, comes the defendant, HEIM, L.P. (hereinafter "Heim"), through its attorneys, MEYER, DARRAGH, BUCKLER, BEBENEK & ECK, P.L.L.C., filing its proposed jury verdict form, as follows:

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TINA LINDQUIST,

Plaintiff,

vs.

HEIM, L.P.,

Defendant.

Civil Action No: 04-249E

**JUDGE SEAN J. MCLAUGHLIN**

PAUL R. ROBINSON, ESQUIRE  
PA I.D. No. 65581  
MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.  
U.S. Steel Tower, Suite 4850  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 261-6600  
Email: [probinson@mdbbe.com](mailto:probinson@mdbbe.com)

**JURY VERDICT**

Question 1

Do you find that the press brake was defective when it left the control of Heim in 1978?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answer Question 1 "no", please return to the courtroom. If you answer Question 1 "yes", please proceed to Question 2.

Question 2

Was the press brake being misused at the time of the plaintiff's injury?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answer Question 2 "yes", please return to the courtroom. If you answer Question 2 "no", please proceed to Question 3.

Question 3

Do you find that the plaintiff assumed the risk of injury by riding the pedal of the foot control?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answer Question 3 "yes", please return to the courtroom. If you answer Question 3, "no", please proceed to Question 4.

Question 4

Do you find that the conduct of the plaintiff's employer, Corry Manufacturing, was a superceding cause of the plaintiff's injuries?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answer Question 4 "yes", please return to the courtroom. If you answer Question 4 "no", please proceed to Question 5.

Question 5

Do you find that the condition of the press brake when it left the control of Heim in 1978 was the proximate cause of the plaintiff's injuries?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answer Question 5 "no", please return to the courtroom. If you answer Question 5 "yes", please proceed to Question 6.

Question 6

Do you find that Heim sold the foot control which Tina Lindquist was using at the time of her accident?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answer Question 6 "no", please return to the courtroom. If you answer Question 6 "yes", please proceed to Question 7.

Question 7

State the amount of damages, if any, which you award to the plaintiff and against Heim.

\$ \_\_\_\_\_

Please return to the courtroom.

Respectfully submitted,

MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.

By: /s/ Paul. R. Robinson

PAUL R. ROBINSON, ESQUIRE  
Attorney for Heim, L.P.  
PA I.D. No. 65581

U.S. Steel Tower, Suite 4850  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 261-6600

**PROOF OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served upon all parties on the date and in the manner listed below:

_____	First Class Mail, Postage Prepaid
_____	Certified Mail - Return Receipt Requested
_____	Hand Delivery
_____	Facsimile Transmission
<u>  X  </u>	Electronic Transmission

at the following address:

Dallas W. Hartman, Esquire  
Dallas W. Hartman P.C.  
2815 Wilmington Road  
New Castle, PA 16105  
*(Counsel for Plaintiff)*

MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.

Date: August 10, 2007

/s/ Paul R. Robinson  
PAUL R. ROBINSON, ESQUIRE